



Community Media Network - Public Access TV

December 13, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

Chairman
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai,

We write to support the Comments of the Cable Act Preservation Alliance (“CAPA”) and to disapprove of the proposals and tentative conclusions set forth in the FCC’s September 25 Further Notice of Proposed Rule Making in *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*, MB Docket 05-311.

Our non-profit organization, Community Media Network, has provided Public, Educational and Government access services and community television to 10 Oakland County, Michigan, Communities since 1983.

For 35 years, CMNtv has provided low-cost, one-on-one training, access to video equipment — including cable and streaming TV channels — and media facilities to all citizens on a non-discriminatory basis. CMNtv offers citizens an accessible, filter-free platform to air their views, opinions and ideas to their communities. This unmatched platform gives individuals an equal footing with enormous broadcasting and publishing outfits.

Just as significantly, CMNtv has strengthened and expanded government transparency in our communities by providing coverage of local government meetings and events. CMNtv produces live coverage of up to 17 government meetings per month across 5 cities on cable TV and streaming channels online. Additionally, we maintain archives of all meetings in multiple formats: cable TV replays, online On-Demand archives and hard copies for citizens and municipalities. In many cases, CMNtv has built video systems for cities from scratch, establishing visibility for government activities that never before existed. CMNtv also provides ongoing maintenance, upgrades and service for these systems and has adapted them to accommodate citizens with audio-visual impairment.

CMNtv has also kept an eye towards the future of our communities with its outreach and engagement to local school districts and students. CMNtv provides our communities’ school districts and students with free access to training on professional equipment, including our mobile production truck. Student crews use the truck in self-directed productions, earning class credit while covering year-round school and athletic events.

In the same vein, CMNtv provides video production services and coverage to local non-profit organizations. Offered well below commercial rates, this coverage allows these organizations to fulfill their missions in a professional, polished manner. Audiences and organizations that are not served by commercial media are served by CMNtv and community media.

In maintaining this platform — offered to all without reservation — CMNtv assists citizens in realizing the power of their first amendment right to freedom of speech, regardless of their individual circumstances.

Franchise Fees — paid by telecommunications companies for use of our shared Right-of-Ways — make all functions of Public Access TV possible.

This local presence enables the residents of our 10 Michigan communities — Auburn Hills, Berkley, Clawson, Ferndale, Huntington Woods, Oakland Township, Pleasant Ridge, Rochester, Royal Oak and Troy — to watch uniquely local programming about their community and local events and issues of interest to them. And that was the intent of the PEG provisions of the 1984 Cable Act – to enhance local voices, serve local community needs and interests, and strengthen our local democracy. **By defining “franchise fee” in an overly broad fashion to include “in-kind” support, the FCC’s proposals will shift the fair balance between cable franchising authorities and cable operators and will force communities to choose between franchise fees and PEG channels, – something that was never the intent of the Act.**

We appreciate your consideration and hope you will protect PEG channels in our community and others **by choosing not to adopt many of the proposals in the Further Notice.**

Sincerely,



Christopher D. Weagel
Executive Director, CMNtv